

APPENDIX N

REPORTS, PLANS AND CERTIFICATIONS UNDER THE LDAR ENHANCED PROGRAM PROVISIONS OF PARAGRAPH 20 OF THE CONSENT DECREE IN UNITED STATES V. MARATHON ASHLAND PETROLEUM LLC

Name or Summary of the Report, Plan, or <u>Certification</u>	CD Sub-Para Nos.	Applicable <u>Refinery(ies)</u> “All” means all seven of MAP’s <u>Refineries</u>	Rqd. (“R”) v. Contingent (“C”)	One-Time (“1”) v. Quarterly or w/ §63.654 Reports (“>1”)	<u>Due Date</u>
Written Refinery-Wide LDAR Program	A; O.i.a	All	R	1	150 D after Lodging
Updated Refinery-Wide LDAR Program	A	All	C	1	As needed
Report on training for new LDAR personnel	B.i; O.ii-c(1)	All	R	>1	In each Section 63.654 Report
Report on annual training for LDAR personnel	B.ii; O.ii-c(1)	All	R	>1	In each Section 63.654 Report
Report on LDAR training for refinery and operations personnel who hold positions relevant to LDAR	B.iii O.ii-c(1)	All	R	>1	In each Section 63.654 Report

LDAR audit reports and records of corrective actions	D; O.ii-b.	All	R	>1	In the Qtrly Report for the 1 st calendar Q of each year
Certification of implementation of the first attempt at repair program	G; O.ii-a(1)	All	R	1	In the first Qtrly report due under the CD or the first Qtrly report in which the rqmt. becomes due
Operational specifications for the dataloggers for LDAR monitoring	I.ii.	All	R	1	In time to ensure electronic LDAR datalogging use at all Refineries by no later than 2 years after the Date of Lodging
Certification of implementation of electronic LDAR monitoring	I.ii;O .i.b	All	R	1	2 years and 30 days after Lodging
Certification of implementation of QA/QC procedures for review of data generated by LDAR monitoring technicians	J; O.ii-a(2)	All	R	1	In the first Qtrly report due under the CD or the first Qtrly report in which the rqmt. becomes due
Identification of each Refinery's LDAR "point" person	K; O.ii-a(3)	All	R	1	In the first Qtrly report due under the CD or the first Qtrly report in which the rqmt. becomes due
Certification of the development of a tracking program for new valves and pumps	L; O.ii-a(4)	All	R	1	In the first Qtrly report due under the CD or the first Qtrly report in which the rqmt. becomes due
Certification of implementation of calibration drift assessment procedures	M; O.ii-a(5)	All	R	1	In the first Qtrly report due under the CD or the first Qtrly report in which the rqmt. becomes due

Certification of implementation of the “delay of repair” procedures	N; O.ii-a(6)	All	R	1	In the first Qtrly report due under the CD or the first Qtrly report in which the rqmt. becomes due
Quarterly monitoring reports	O.ii-c(2)	All	R	>1	In each Section 63.654 Report